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## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
v.	)	Criminal No. 19-369 (18 U.S.C. § 922(g)(1))
LAFON ELLIS	Ć	

**INDICTMENT** 

FILED

**COUNT ONE** 

DEC 10 2019

The grand jury charges:

CLERK U.S. DISTRICT COURT WEST, DIST, OF PENNSYLVANIA

On or about August 21, 2018, in the Western District of Pennsylvania, the defendant, LAFON ELLIS, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely:

- a. Robbery Threat of Serious Bodily Injury (two counts) and Burglary, on or about September 18, 2013, at Docket Number CP-02-CR-0004205-2013, in the Court of Common Pleas, County of Allegheny, Criminal Division, Commonwealth of Pennsylvania; and
- b. Possession of a Firearm with an Altered or Obliterated Mark of Identification and Possession of a Firearm without a License, on or about November 18, 2013, at Docket Number CP-02-CR0008234-2013, in the Court of Common Pleas, County of Allegheny, Criminal Division, Commonwealth of Pennsylvania,

knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: one .40 caliber Sig Sauer pistol, bearing Serial Number 24B218104, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

## FORFEITURE ALLEGATIONS

1. The grand jury re-alleges and incorporates by reference the allegations contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant

to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section

2461(c).

2. As a result of the knowing commission of a violation of Title 18, United

States Code, Sections 922(g)(1) charged in Count One of the Indictment, the following property

is property involved in, used, and intended to be used in the commission of such offense, and

therefore is subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1): the

firearm and ammunition named in Count One of this Indictment.

A True Bill,

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SCOTT W. BRADY United States Attorney PA ID No. 88352